REMARKS

Claims 1, 4-9, 12-17, and 20-27 are pending in the application. In the non-final Office Action dated October 29, 2007, the Examiner rejected claims 1, 4-9, 12-17, and 20-27 under 35 U.S.C. §103(a) as being unpatentable over *Rybicki, et al. (U.S. 5,630,081)("Rybicki")* in view of *Kucala (U.S. 5,832,489)*. Applicants respectfully traverse the rejection and address the Examiner's disposition below. Claims 1, 9, and 17 have been amended.

Independent claims 1, 9, and 17, each as amended, each claim subject matter relating to modifying an original document at a disconnected device to produce a modified document. The modified document includes a record of tracked changes made to the original document when the original document is modified on the disconnected device. The modified document is returned from the disconnected device to a computer, where a change tracker determines one or more modifications between the original document and the modified document by analyzing the tracked changes included in the modified document. The change tracker includes a data translation operation to convert tracked changes to a protocol useable by the computer if change tracking software on the disconnected device is not compatible with the change tracking software on the computer.

This is clearly unlike *Rybicki* in view of *Kucala*, which fails to disclose or suggest determining one or more modifications between an original document and a modified document received from a disconnected device by analyzing a record of tracked changes included in the modified document. As acknowledged by the Examiner, *Rybicki* fails to teach this claimed subject matter. *Office Action of 10/29/07*, page 3. The Examiner argues that *Kucala* teaches this claimed subject matter. *Office Action of 10/29/07*, page 8. Applicants disagree.

Kucala teaches a system in which files on a palmtop device can be synchronized with files on a PC. To do so, *Kucala* compares the contents of the palmtop device files to the contents of the corresponding PC files. If the palmtop device file's format is incompatible with the PC (*e.g.*, there are more fields in the palmtop device file), then the palmtop device file is converted to a format that can be read by the PC. *Kucala* 5:39-51.

Unlike Applicants' claimed invention, nowhere does *Kucala* disclose or suggest that its palmtop device files include a record of tracked changes. Instead, *Kucula* merely describes that it checks the contents of the files themselves, such as by identifying newly added or deleted

records. Nowhere does *Kucala* teach or suggest that the file from its palmtop device includes a record of tracked changes. This is simply not discussed in *Kucala.* Accordingly, *Kucala* could not determine whether there are differences between its palmtop device files and PC files by analyzing a record of tracked changes in its files. This subject matter is simply not addressed in *Kucala.*

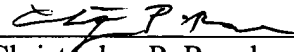Therefore, *Rybicki* in view of *Kucala* fails to disclose or suggest claims 1, 9, and 17.

Claims 4-8, 12-16, and 20-27 depend from claims 1, 9, or 17 and are therefore patentable for at least the same reasons as given for claims 1, 9, and 17.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

CONCLUSION

In view of the above amendments and remarks, Applicant submits that claims 1, 4-9, 12-17, and 20-27 are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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